

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

MOTION FOR LATE ACCEPTANCE OF  
RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO ADVO INTERROGATORIES  
(ADVO/USPS-T13-74-100)  
(April 13, 2000)

The United States Postal Service hereby moves for acceptance of the responses of witness Raymond to the following interrogatories of Advo, Inc., eight business days late: ADVO/USPS-T13-74-100, filed on March 20, 2000. Several factors contributed to the delay in providing these responses. First, witness Raymond has been the target of hundreds of interrogatories in recent weeks, and has also been needed to assist in formulating responses to a number of procedural challenges related to certain of his interrogatory responses, as well as to facilitate and conduct a special technical conference pursuant to Presiding Officer's Ruling No. R2000-1/27. Second, the assistance of other individuals, who are also involved in other aspects of this case, was needed to prepare and review the responses. Finally, the high volume of discovery requests during this period prevented counsel from immediately reviewing the answers under development.

An electronic version of these responses was sent by email today to counsel for  
Advo, Inc.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

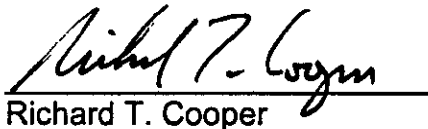
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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Washington, D.C. 20260-1137  
April 13, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all  
participants of record in this proceeding in accordance with section 12 of the Rules of  
Practice.

  
Richard T. Cooper

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April 13, 2000